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28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

21 Kajan Johnson, Clarence Dollaway, and Tristan
22 Connelly, on behalf of themselves and all others
23 similarly situated,

24 Plaintiffs,

25 v.

26 Zuffa LLC, TKO Operating Company, LLC f/k/a
27 Zuffa Parent LLC (d/b/a Ultimate Fighting
28 Championship and UFC) and Endeavor Group
Holdings, Inc.,

Defendants.

No.: 2:21-cv-01189-RFB-BNW

**NOTICE OF RELATED CASE AND
RENEWED REQUEST TO ENTER
STIPULATIONS**

Pursuant to LR 42-1, Plaintiffs Kajan Johnson, Clarence Dollaway, and Tristan Connelly submit this Notice of Related Case to inform the Court that, on May 23, 2025, Counsel for Plaintiffs and the Proposed Class filed a related action in this District, captioned *Mikhail Cirkunovs, on behalf of himself and all others similarly situated v. Zuffa LLC, TKO Operating Company, LLC f/k/a Zuffa Parent LLC (d/b/a Ultimate Fighting Championship and UFC) and Endeavor Group Holdings, Inc.*, No. 2:25-cv-00914-ART-BNW (D. Nev.). The *Cirkunovs* Complaint substantively mirrors the *Johnson* Complaint, but it brings claims on behalf of *only* those UFC Fighters in the present *Johnson* Proposed Class who have signed arbitration agreements and/or class-action waivers, according to the following Class Definition:

All persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from July 1, 2017 until the scheme alleged herein ceases (“Class Period”), where such persons signed a contract with Zuffa LLC that contained an arbitration clause and/or class-action waiver. The Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought or broadcast in the United States.

See *Cirkunovs* Compl. ¶ 37, No. 2:25-cv-00914-ART-BNW, ECF No. 1. Plaintiffs filed the *Cirkunovs* Complaint as related to this case. However, it was randomly assigned to Judge Anne R. Traum. Plaintiffs are filing a notice of related action in *Cirkunovs* seeking to have the *Cirkunovs* case be reassigned to Your Honor.

In light of the filing of the *Cirkunovs* Complaint, Plaintiffs renew their request for the Court to enter the Parties’ Stipulation to Address Defendant Zuffa’s Motion to Deny Class Certification or, in the Alternative, Strike Class Allegations, ECF No. 191, and Stipulation to Plaintiffs’ Filing of Second Amended Complaint, ECF No. 194. In those Stipulations, the Parties agreed to Plaintiffs’ amendment of the *Johnson* Class Definition to bring claims on behalf of the following Class:

All persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from July 1, 2017 until the scheme alleged herein ceases (“Class Period”). The Class excludes all persons who are not residents or citizens of the United States unless the UFC paid such persons for competing in a bout fought or broadcast in the United States. The Class also excludes all persons who have signed a Promotion Agreement or other contract with Zuffa, LLC that contains an arbitration agreement and/or class-action waiver.

See ECF No. 191 ¶ 2.

Together, this revised proposed Class and the proposed *Cirkunovs* Class collectively brings the

1 same claims on behalf of the same set of UFC Fighters as had the original *Johnson* Proposed Class but
2 allows UFC Fighters with arbitration agreements and/or class-action waivers in their contracts to litigate
3 the enforceability of those clauses separate and apart from UFC Fighters who did not sign such
4 agreements. Plaintiffs thus respectfully request that the Court enter the Parties' Stipulations allowing
5 Zuffa to withdraw its Motion to Deny Class Certification or, in the Alternative, Strike Class Allegations,
6 as set forth in ECF No. 191, and stipulation allowing Plaintiffs to file the Second Amended Complaint
7 attached as Exhibit A to ECF No. 194, in order to effectuate this dual-track litigation. Defendants do not
8 oppose the requested relief.
9

10 Dated: May 28, 2025

Respectfully submitted,

11 /s/ Eric L. Cramer

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17 *Clarence Dollaway, and Tristan Connelly and*
18 *the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on May 28, 2025, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Eric L. Cramer

Eric L. Cramer